UNITED STATES DISTRICT COURT FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

JOSEPH FRIEL, individually and on behalf of a class of all persons and entities similarly situated,

CASE NO. 3:24-cv-01866-JKM

Judge: Hon. Julia K. Munley

Plaintiff,

v.

LINE 5, LLC, HEADSTART WARRANTY GROUP LLC and JEA MANAGEMENT SERVICES d/b/a COVERED AUTO,

Defendants.

DEFENDANT JEA MANAGEMENT SERVICES' MOTION TO DISMISS PLAINTIFF'S COMPLAINT FOR FAILURE TO STATE A CLAIM

Pursuant to Federal Rule of Civil Procedure 12, Defendant JEA Management Services d/b/a Covered Auto ("JEA") hereby moves to dismiss Plaintiff's Complaint for failure to state a claim. JEA incorporates by reference its Brief in Support of its Motion as if fully stated herein.

Dated: January 21, 2025 Respectfully submitted,

NELSON MULLINS RILEY & SCARBOROUGH, LLP

/s/ Elyse N. Cohen Elyse N. Cohen, Esq. PA Attorney Id. No. 320787 1000 Westlakes Drive, Suite 275 Berwyn, PA 19312 (p): 610-943-5354 Elyse.Cohen@nelsonmullins.com

TROUTMAN AMIN, LLP

Eric J. Troutman, Esq. CA Bar Id. No. 229263 (pro hac vice application pending-1/17/2025)

Puja Amin, Esq. CA Bar Id. No. 299547 (pro hac vice application pending-1/17/2025)

Tori L. Guidry, Esq. LA Bar Id. No. 37704 (pro hac vice application pending-1/17/2025)

400 Spectrum Center Drive, Suite 1550 Irvine, CA 92618 (p): 949-350-3663

Attorneys for Defendant, JEA Management Services d/b/a Covered Auto